

EXHIBIT C

Alexander Fantauzzo

From: Maureen T. Bass
Sent: Thursday, July 22, 2021 9:11 AM
To: Steve Cole
Cc: Calabrese, Jeffrey; Sharon Stiller; Jeremy Sher
Subject: Re: Motion To Compel Premium v. Supreme et al.

Since Plaintiffs' discovery responses were served first, Defendants are required to respond first. You've had the demands for months and my correspondence for nearly a month. Let's skip the call since you seem so busy and just get me the responses within ten days. In addition to responses, I'll need your schedules that work for the witnesses under your control. Our responses will be served at the same time. I'll circulate an amended scheduling order that pushes everything out 4 months.

Sent from my iPhone

Maureen T. Bass, Esq.

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On Jul 22, 2021, at 7:27 AM, Steve Cole <scole@adamsleclair.law> wrote:

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Maureen,

Thanks for your e-mail. We are happy to discuss the completion of discovery and the timing of responses by all parties. Our records indicate that Plaintiffs have also failed to provide discovery responses or produce documents. I am available

July 28, 29, or 30 for a conference call. Please propose some dates and times when you would be available.

Steve

From: Maureen T. Bass <MBass@Abramslaw.com>
Sent: Wednesday, July 21, 2021 4:23 PM
To: 'Calabrese, Jeffrey' <jcalabrese@hseilaw.com>; Steve Cole <scole@adamsleclair.law>
Cc: Sharon Stiller <SStiller@Abramslaw.com>
Subject: [External] Motion To Compel Premium v. Supreme et al.

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Gentlemen,

Plaintiffs' discovery demands were issued on October 30, 2020. In February, I spoke to Jeff who advised that his colleague was working on his clients' responses and that they would be forthcoming. On June 29, 2021, we sent correspondence requesting that responses and proposed deposition dates so as to be received no later than July 19, 2021. To date, and aside from the February communication with Jeff, we have received no response.

We will be filing a motion to compel, as well as a motion to extend the scheduling order. We believe that our previous correspondence has satisfied our obligations to meet and confer in connection with Defendants' complete failure to respond to Plaintiffs' discovery demands. If you disagree and believe that a telephone conference is required, notify the undersigned no later than July 23, 2021. If we do not hear from you before that date, Plaintiffs will be moving forward with motion practice.

Thank you.
Maureen

Maureen T. Bass, Esq.

<image001.jpg>

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